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December 8, 2022

VIA ECF

Hon. Naomi Reice Buchwald
United States District Judge
Patrick M. Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Request for Extension to File Sentencing Submission and Adjournment of Sentence
United States v. Frank Rios, 21 Cr. 610 (NRB)

Dear Judge Buchwald:

I write to request an extension of time to file my sentencing submission for Frank Rios, and an adjournment of the sentence currently scheduled for December 20, 2022. I ask for an additional month, until January 9, 2023 to file my sentencing submission, and that sentence be adjourned until the week of January 23.


The reason for this request is that during the months of October and November we sold our house and bought a new one closer to family and closer to the city. There was a problem that required we live with neighbors for two weeks before being able to close both houses. We just moved into the new house this past weekend. The entire process has been extremely disruptive to my law practice, and hence I have not obtained letters of support from Mr. Rios's family and friends, nor met with Mr. Rios to discuss sentence. Normally two weeks more would be sufficient; however, because Mr. Rios's family lives in Puerto Rico and the mail is often delayed during the holidays through New Year's, I feel it is necessary to have the extra time to make sure that all letters in support reach me in time.

I have spoken to AUSA Samuel Rothschild regarding this issue, and he advises me that the government has no objection to my request. Thank you for your consideration of this matter.

Application granted. The sentencing hearing is adjourned until January 24, 2023 at 1:00 p.m. Defendant's submission is due on January 9, 2023. The Government's submission is due on January 17, 2023. **SO ORDERED.**

Sincerely,

Camille M. Abate
Camille M. Abate, Esq.


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: New York, New York
December 9, 2022